

IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION

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UNITED STATES OF AMERICA

v.

JOHN CARL HALL (5)  
Defendant

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No. 3:14-CR-367-B-5

**DEFENDANT'S UNOPPOSED MOTION TO CONTINUE SENTENCING  
AND ASSOCIATED DEADLINES**

COMES NOW, JOHN CARL HALL, Defendant herein, by and through the undersigned counsel, and respectfully submits this *Unopposed Motion to Continue Sentencing and Associated Deadlines*, and in support thereof would show as follows:

1. Pursuant to the Court's *Scheduling Order* of January 16, 2015, the sentencing in this cause is currently scheduled for May 8, 2015, at 1:30 p.m..
2. Counsel respectfully requests a continuance of the sentencing in this cause, as well as an extension of the associated deadlines; the undersigned avers that Defendant's sentencing will turn upon this Court's resolution of a number of disputed issues - both factual and legal - and counsel has yet to file objections or, for that matter, any of the sentencing materials upon which he will rely at sentencing.
3. While counsel respectfully submits that this requested continuance will occasion no prejudice to either party, counsel must acknowledge that the *belated nature* of this request - that is, on the near eve of sentencing - may inflict an inconvenience upon the Court. In light of this potential, counsel offers his sincerest and most humble apology.

By way of explanation - if not excuse - counsel respectfully submits that in the thirty (30) day period between April 21<sup>st</sup> and May 20<sup>th</sup>, counsel's docket includes four federal sentencings - one of which has been completed - and two felony jury trials - one of which has also been completed; in the course of this, counsel regrettably overlooked this impending matter. Lastly, in an admitted effort to mitigate some manner of his lack of consideration, counsel avers that he has undertaken the representation of Defendant Hall with the understanding that Defendant is wholly indigent. Counsel's participation, from its inception, is entirely *pro bono*, compensation having neither been requested nor, for that matter, would it be accepted.

4. Finally, counsel submits that the Government is UNOPPOSED to the granting of this relief.

Respectfully,

/s/ Michael Levine  
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**CERTIFICATE OF CONFERENCE**

I certify that I have conferred with counsel for the Government, A.U.S.A. P.J.Meitl, regarding Defendant's requested relief and that he is UNOPPOSED.

/s/ Michael Levine  
MICHAEL LEVINE

**CERTIFICATE OF SERVICE**

I hereby certify that on May 6, 2015 the following document was filed electronically, using the ECF system for the Northern District of Texas, Dallas Division, and that a copy of this document will be provided electronically to all counsel of record whom have consented to service in this manner.

/s/ Michael Levine  
MICHAEL LEVINE